

Dear FCC,

I have recently become aware of NPRM Docket 01-278 that has been generated primarily in response to SAVI Technology's petition RM-10051. I strongly oppose the addition of proposed Section 15.240 because of the great likelihood that it will increase interference in the 70-cm Amateur Radio band.

The 70-cm Amateur Radio band supports quite a bit of Amateur Radio Operator activity here in the Chicago metropolitan area. And, it is second only to the 2m Amateur Radio band for use in public service operations in this area. I feel that the increased field strength levels and duty cycles that are being proposed for use with RFID tag systems are not only likely to cause increased interference to the licensed Amateur Radio operations on the 70-cm band, but I also feel that such problems will likely be difficult to resolve because of the nature of RFID tag systems.

Additionally, I feel that SAVI's statement that RFID tag systems are unlikely to cause interference to Amateur communications because such systems are typically used in commercial areas is flawed. First, the proposed increase in field strength will likely cause the RFID signals to travel well beyond the "commercial areas". And, second, there is nothing in the proposal that would prevent a user (such as United Parcel Service) from deploying such RFID tag systems on trucks in the field in the future -- interference caused by such systems would be difficult to resolve at best.

Thank you for your consideration.

Sincerely,

Michael J. Linden

member IEEE (Institute of Electrical and Electronics Engineers)  
ARRL (American Radio Relay League)